

Report of Organizational Actions Affecting Basis of Securities

► See separate instructions.

Part I Reporting Issuer

1 Issuer's name		2 Issuer's employer identification number (EIN)	
Foley Trasimene Acquisition Corp. II		85-1961020	
3 Name of contact for additional information	4 Telephone No. of contact	5 Email address of contact	
Bryan Coy	(702) 323-7330	Bryan.Coy@trasimenecapitalmgmt.com	
6 Number and street (or P.O. box if mail is not delivered to street address) of contact		7 City, town, or post office, state, and ZIP code of contact	
1701 Village Center Circle		Las Vegas, NV 89134	
8 Date of action		9 Classification and description	
March 30, 2021		Business Combination	
10 CUSIP number	11 Serial number(s)	12 Ticker symbol	13 Account number(s)

Part II Organizational Action Attach additional statements if needed. See back of form for additional questions.

14 Describe the organizational action and, if applicable, the date of the action or the date against which shareholders' ownership is measured for the action ► [See attached statement.](#)

15 Describe the quantitative effect of the organizational action on the basis of the security in the hands of a U.S. taxpayer as an adjustment per share or as a percentage of old basis ► [See attached statement.](#)

16 Describe the calculation of the change in basis and the data that supports the calculation, such as the market values of securities and the valuation dates ► [See attached statement.](#)

Part II Organizational Action *(continued)*

17 List the applicable Internal Revenue Code section(s) and subsection(s) upon which the tax treatment is based ▶ Sections 351(a) and 358(a) and (b).

18 Can any resulting loss be recognized? ▶ No loss can be recognized as a result of the Merger.

19 Provide any other information necessary to implement the adjustment, such as the reportable tax year ▶ The Merger occurred on March 30, 2021. Thus, the basis adjustment should be made for the FTAC shareholder's taxable year that includes this date.

Sign Here Under penalties of perjury, I declare that I have examined this return, including accompanying schedules and statements, and to the best of my knowledge and belief, it is true, correct, and complete. Declaration of preparer (other than officer) is based on all information of which preparer has any knowledge.

Signature ▶ _____ Date ▶ _____

Print your name ▶ _____ Title ▶ _____

Paid Preparer Use Only	Print/Type preparer's name	Preparer's signature	Date	Check <input type="checkbox"/> if self-employed	PTIN
	Gregory Dunlap		04/17/2021		P00040331
	Firm's name ▶ Deloitte Tax LLP	Firm's EIN ▶ 86-1065772		Phone no. (714) 436-7100	
	Firm's address ▶ 695 Town Center Dr. Suite1000, Costa Mesa, CA 92626				

ADDITIONAL STATEMENT TO FORM 8937 REPORT OF ORGANIZATIONAL ACTIONS AFFECTING BASIS OF SECURITIES

Business Combination: March 30, 2021

PART II

14. Describe the organizational action and, if applicable, the date of the action or the date against which shareholder's ownership is measured in the action.

On March 30, 2021, in accordance with the terms of the Agreement and Plan of Merger with Foley Trasimene Acquisition Corp. II ("FTAC"), Paysafe Limited (the "Company"), Paysafe Merger Sub Inc., a direct, wholly owned subsidiary of the Company ("Merger Sub"), Paysafe Group Holdings Limited ("PGHL"), Paysafe Bermuda Holding LLC, and Pi Jersey Holdco 1.5 Limited ("Pi Jersey Holdco" and together with the foregoing, the "Parties") dated December 7, 2020, the Parties completed the business combination transaction (the "Business Combination") pursuant to which, among other things, (i) Merger Sub merged with and into FTAC, with FTAC being the surviving corporation in the merger and a direct subsidiary of the Company (the "Merger"), and each outstanding share of FTAC's Class A common stock, par value \$0.0001 per share, and FTAC's Class B common stock, par value \$0.0001 per share (together, "FTAC Common Stock"), converted into the right to receive one common share, par value \$0.001 per share, of the Company ("Company Common Stock"), and (ii) PGHL transferred Pi Jersey Holdco to the Company in exchange for shares of Company Common Stock and cash. Any other shares of FTAC stock outstanding were cancelled and no consideration was paid with respect thereto. Any outstanding FTAC warrants were exchanged for warrants to purchase shares of Company Common Stock. No fractional shares of Company Common Stock were issued upon the surrender for exchange of shares of FTAC Common Stock.

15. Describe the quantitative effect of the organizational action on the basis of the security in the hands of a U.S. taxpayer as an adjustment per share or as a percentage of old basis.

The holders of FTAC Common Stock recognized no gain or loss on the Merger. To the extent the holders of FTAC Common Stock received an amount of Company Common Stock with a fair market value equal to the fair market value of the shares that were surrendered, the aggregate basis that the former holders of FTAC Common Stock have in Company Common Stock received will equal the aggregate basis that the holders of FTAC Common Stock had in the shares surrendered in the exchange. The basis of each share surrendered will be allocated to the share of Company Common Stock (or allocable portions thereof) received in a manner that reflects, to the greatest extent possible, that the shares of Company Common Stock received is received in respect of shares of stock that were acquired on the same date and at the same price. To the extent it is not possible to allocate basis in this manner, the basis of the share of FTAC Common Stock surrendered will be allocated to the share of Company Common Stock (or allocable portions thereof) received in a manner that minimizes the disparity in the holding periods of the surrendered share of FTAC Common Stock whose basis is allocated to any particular share of Company Common Stock received.

16. Describe the calculation of the change in basis and the data that supports the calculation, such as the market values of securities and the valuation dates.

To the extent the holders of FTAC Common Stock received an amount of Company Common Stock with a fair market value equal to the fair market value of the shares that were surrendered, the aggregate basis that the former holders of FTAC Common Stock have in Company Common Stock received will equal the aggregate basis that the holders of FTAC Common Stock had in the shares surrendered in the exchange. The basis of each share surrendered will be allocated to the share of Company Common Stock (or allocable portions thereof) received in a manner that reflects, to the greatest extent possible, that the shares of Company Common Stock received is received in respect of shares of stock that were acquired on the same date and at the same price. To the extent it is not possible to allocate basis in this manner, the basis of the share of FTAC Common Stock surrendered will be allocated to the share of Company Common Stock (or allocable portions thereof) received in a manner that minimizes the disparity in the holding periods of the surrendered share of FTAC Common Stock whose basis is allocated to any particular share of Company Common Stock received.